

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

PROJECT VERITAS *et al.*,

*Counterclaim-Defendants,*

*v.*

JAMES O'KEEFE *et al.*,

*Counterclaimants.*

Case No. 7:23-CV-04533-CS-AEK

**DECLARATION OF JOSHUA HUGHES**


I, JOSHUA HUGHES, hereby swear or affirm as follows:

1. Attached as Exhibit 1 is a true and correct copy of an excerpt of the Project Veritas and Project Veritas Action Fund (collectively, "PV") Employee Handbook containing at least some of PV's policies concerning PV's electronic communications systems ("ECS"). To the best of my knowledge, information, and belief, these ECS policies were effective as of the date of James O'Keefe's departure from PV.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Long Valley, NJ 07853

Date: July 9, 2025

A handwritten signature in black ink, appearing to read "Josh Hughes", is written over a horizontal line.

Joshua Hughes